



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE  
GOVERNOR

AVERY T. DAY  
ACTING COMMISSIONER

**ReEnergy Ashland LLC  
Aroostook County  
Ashland, Maine  
A-577-77-3-A**

**Departmental  
Findings of Fact and Order  
New Source Review  
NSR #3**

**FINDINGS OF FACT**

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes Annotated (M.R.S.A.), Section 344 and Section 590, the Maine Department of Environmental Protection (Department) finds the following facts:

**I. REGISTRATION**

**A. Introduction**

FACILITY	ReEnergy Ashland LLC (REA)
LICENSE TYPE	06-096 CMR 115, Minor Modification
NAICS CODES	221117
NATURE OF BUSINESS	Biomass Electrical Power Generation
FACILITY LOCATION	63 Realty Rd, Ashland, Maine

**B. Amendment Description**

ReEnergy Ashland LLC (REA) has requested an amendment to their air emission license to remove emission limits for NO<sub>x</sub> that are extraneous, irrelevant, and circular.

**C. Emission Equipment**

The following equipment is addressed in this air emission license:

<b>Equipment</b>	<b>Maximum Heat Input Capacity (MMBtu/hr)</b>	<b>Max. Firing Rate</b>	<b>% sulfur</b>	<b>Install. Date</b>
Boiler #1	586 (biomass) 106.7 (distillate fuel)	65.1 ton/hr 762.1 gal/hr	Negligible 0.5%	1992

D. Application Classification

The application for REA does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing or record keeping. However, this application does seek to modify a Best Practical Treatment (BPT) incorporated through New Source Review (NSR).

This modification will not result in any increase in permitted or actual emissions. Therefore, this amendment is determined to be a minor modification under *Minor and Major Source Air Emission License Regulations* 06-096 CMR 115 (as amended). An application to incorporate the requirements of this amendment into the Part 70 air emission license has been submitted to the Department.

II. AMENDMENT DESCRIPTION

A. Boiler #1

Boiler #1 is a wood-fired boiler manufactured by Zurn Energy installed in 1992. It supplies steam to a General Electric steam turbine capable of producing approximately 39.6 gross megawatts of electrical power.

REA previously amended their air emission license to address emission limits and the installation and operation of NO<sub>x</sub> control equipment which allows them to sell energy in the New England renewable energy credit (REC) market. NSR air emission license A-577-77-1-A established additional NO<sub>x</sub> emission limits for periods of time when REA is generating power for distribution and sale to the REC market.

These limits include the following:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
NO <sub>x</sub>	0.15 (See Note 1&4)	(A-577-77-1-A) 06-096 CMR 140, BPT	Federally Enforceable
NO <sub>x</sub>	0.10 (See Note 2&4)	(A-577-77-1-A) 06-096 CMR 140, BPT	Federally Enforceable
NO <sub>x</sub>	0.075 (See Note 3)	(A-577-77-1-A) 06-096 CMR 140, BPT	Federally Enforceable

Pollutant	lb/hr	Origin and Authority	Enforceability
NO <sub>x</sub>	87.9 (See Note 1&4)	(A-577-77-1-A) 06-096 CMR 140, BPT	Federally Enforceable
NO <sub>x</sub>	58.3 (See Note 2&4)	(A-577-77-1-A) 06-096 CMR 140, BPT	Federally Enforceable
NO <sub>x</sub>	43.8 (See Note 3)	(A-577-77-1-A) 06-096 CMR 140, BPT	Federally Enforceable

Note 1: Emission limit is applicable at all times during plant operation based on a 24-hour block average.

Note 2: Emissions limit is applicable at all times the facility is generating power for distribution and sale as renewable energy in the New England renewable energy market, based on a 24-hour block average.

Note 3: Emissions limit is applicable at all times the facility is generating energy for distribution and sale as renewable energy in the New England renewable energy market, based on a quarterly average.

Note 4: A 24-hour block average shall be defined as midnight to midnight.

BACT for NO<sub>x</sub> from Boiler #1, the facility's annual emissions, and compliance with ambient air quality standards are based on the 0.15 lb/MMBtu and 87.9 lb/hr emission limits and not the lower limits reserved only for when the facility is generating power for sale on the REC market. In addition, the add-on NO<sub>x</sub> pollution control equipment (ECOTUBE) is not required to be operated provided Boiler #1 does not exceed the 0.15 lb/MMBtu emission limit.

REA has requested that the 0.10 lb/MMBtu and 0.075 lb/MMBtu emission limits and the associated lb/hr NO<sub>x</sub> emission limits be removed from their license. These limits are extraneous and irrelevant since they pertain only to REA's participation in the REC market. These limits are also circular in nature since failure to meet the lower limits automatically disqualifies REA from the REC market which in turn exempts them from the lower emission limits.

The Department agrees with REA's assessment and has determined that compliance with emission limits of 0.15 lb/MMBtu and 87.9 lb/hr and the operation of the ECOTUBE system, as necessary to meet these emission limits, to be BACT for NO<sub>x</sub> from Boiler #1.

#### B. Annual Emissions

This amendment does not affect permitted annual emissions of any regulated pollutant.

### III. AMBIENT AIR QUALITY ANALYSIS

REA previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards (see licenses A-577-77-1-A issued on 11/30/07 and A-577-72-D-A/R issued on 1/24/97). An additional ambient air quality analysis is not required for this amendment.

### ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-577-77-3-A pursuant to the preconstruction licensing requirements of 06-096 CMR 115 and subject to the specific conditions below.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

### SPECIFIC CONDITIONS

**The following shall replace Condition (16)(A) of Air Emission License A-577-77-1-A:**

#### (16) **Boiler #1**

A. NO<sub>x</sub> and CO emissions from Boiler #1 shall not exceed the following limits:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
NO <sub>x</sub>	0.15 (See Note 1)	06-096 CMR 115, BACT	<b>Federally Enforceable</b>
CO	0.95 (See Note 1)	06-096 CMR 115, BACT	<b>Federally Enforceable</b>

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Pollutant	lb/hr	Origin and Authority	Enforceability
NO <sub>x</sub>	87.9 (See Note 1)	06-096 CMR 115, BACT	Federally Enforceable
CO	556.6 (See Note 1)	06-096 CMR 115, BACT	Federally Enforceable

Note 1: Emission limit is applicable at all times during plant operation based on a 24-hour block average. A 24-hour block average shall be defined as midnight to midnight.

DONE AND DATED IN AUGUSTA, MAINE THIS 23 DAY OF December, 2015.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Come for  
AVERY T. DAY, ACTING COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 11/2/15

Date of application acceptance: 11/5/15

Date filed with the Board of Environmental Protection:

This Order prepared by Lynn Muzzey, Bureau of Air Quality.

